

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VORTEX PATHWAY LLC, a Texas limited liability corporation,	§	
	§	
	§	
Plaintiff,	§	Civil Action No. 2:16-cv-956
	§	
v.	§	Jury Trial Demanded
	§	
CHUNGHWA TELECOM CO., LTD., a Taiwanese corporation,	§	
	§	
	§	
Defendant.	§	
	§	
	§	

UNOPPOSED MOTION FOR LEAVE TO AMEND COMPLAINT

Plaintiff VORTEX PATHWAY LLC, by and through undersigned counsel, and for its leave to file an Amended Complaint states as follows:

On August 26, 2016 Plaintiff filed its Complaint for Patent Infringement against Defendant Chunghwa Telecom Global, Inc., a California corporation (“CTG”). CTG was served on September 2, 2016 by serving the registered agent, Minghsien Joe Yang. CTG filed its Answer to the Complaint on October 10, 2016.

Counsel for Plaintiff and Defendant conferred on October 25, 2016 and it was determined that Plaintiff named the incorrect Chunghwa Telecom entity in its Complaint. Counsel for Defendant advised that the correct defendant is Chunghwa Telecom Co., Ltd. (“CTC, LTD.”). During this conversation, the parties agreed to amend the Complaint removing CTG as a party and replacing it with CTC, LTD, and that thereafter Plaintiff would dismiss CTG. A copy of the Amended Complaint with exhibits is attached hereto as Exhibit A.

WHEREFORE, Plaintiff prays that this Court enter its Order granting Plaintiff's Unopposed Motion for Leave to Amend Complaint and for such other and further relief as this court deems just and proper in the premises.

Dated: December 9, 2016

Respectfully submitted,

**SCHNEIDER ROTHMAN INTELLECTUAL
PROPERTY LAW GROUP, LLC**

/s/ Joel B. Rothman _____

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**ATTORNEYS FOR PLAINTIFF
VORTEX PATHWAY LLC**

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on December 9, 2016 a true and correct copy of the foregoing document was sent via electronic mail by the Court's CM/ECF System to all parties listed below on the Service List.

/s/ Joel B. Rothman _____
Joel B. Rothman

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